

From: [Mathieus, George](#)
To: [Jason Gildea](#)
Subject: RE: Lower Gallatin - If nothing else, just read this email....
Date: 10/26/2012 10:51 AM

I have the same concerns. However there is a big difference between assessments, TMDLs, and Standards setting. I'm still not happy with the low amount of sampling, but I think there needs to be a better job of explaining what was done.

Personally, I do not have the time to review every 600-page document. I told Mark we need a better system of how we collectively review TMDLs, especially nutrient ones. Another thing that needs fixed is how you guys review them. From my perspective, your "informal" review is invaluable, but I sense that staff somehow believe or think that your informal review occurs at a "Final Draft" stage. This clearly does not work. They expect to send it out very shortly after you review it, but if you find substantial issues, that is just not possible. Somehow you review needs to be earlier, in my opinion. Then somehow mark and I need to know what is going on. The whole 2014 thing makes all of this very difficult.

So, either way, I appreciate your comments, I think we need to address the WLA thing. Tina and I were thinking some of it can be handled with response to comments. The poorly written thing is nothing new. I don't think it's Christian, I think it's the program. I think those guys have consistently wrote WAY TOO MUCH, and it becomes so overly detailed, that no one else can understand it. I purposively got involved and made them re-write some of the WLA stuff, because it just didn't make sense. My preference would be to focus on the areas/sections that really matter, rather than a re-write.....

We all need to sit down at some point soon on this one and plan better for future ones. Thanks for the input.

-George

From: Gildea.Jason@epamail.epa.gov [mailto:Gildea.Jason@epamail.epa.gov]
Sent: Thursday, October 25, 2012 5:22 PM
To: Mathieus, George
Subject: Lower Gallatin - If nothing else, just read this email....

George - Just to belabor the Lower Gallatin TMDLs a bit more....

We had a good meeting with Dean and Christian today on the Lower Gallatin TMDLs, and I think we can work through a lot of our technical concerns and have an approvable document. I think the main problem that YOU need to be concerned about is the "optics/perception" generated from this document. I can think of 3 main issues that you should be aware of:

(1) There are few data available for many of the streams, particularly on the main stem East Gallatin River. This just looks bad, although its not a show-stopper.... i.e., DEQ prescribed a methodology for collecting and evaluating nutrient data, vetted that through the nutrient workgroup and standards department, and then didn't follow that methodology for the Lower Gallatin TMDLs. I know that this step is not required for TMDL development... my only point is that "it looks bad/inconsistent". Also, it

really limits the accuracy of the source assessment/load calculations (which did not employ any kind of modeling).

(2) The method for calculating source loads for all nutrient impaired streams is VERY simple (i.e., perform ONE synoptic sampling event for each stream, and use that to determine source loadings). I think that also looks bad, especially given the politics and the complexity of the watershed. And especially given that models and much more intense source assessments have been and will be done for other areas (e.g., Lake Helena, Flathead, Flint, Bitterroot, etc). The perception is that the Lower Gallatin wasn't important enough to do something more complex.

(3) The document is poorly written... I think that is due to a number of factors, likely because the issues are very complex, there are a lot of different types of sources to discuss, and it's Christian's first TMDL document. It's just hard to read, and I can understand why the city (and others) might be confused on several different issues. I made lots of comments to (hopefully) help clarify the document, and I think a lot of our concerns will be addressed in the next version of the report.

Anyways, I just wanted to pass on my concerns, and recommend that DEQ management gives this a thorough review before submitting to EPA.... I can foresee litigation in our future over the Lower Gallatin TMDLs, and we need to make sure that the document is solid before finalizing.

Thanks!

Jason

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